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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSUE BERNAL RODRIGUEZ,  
  
Defendant.

Case No. 3:21-cr-00002-LRH-CLB

**STIPULATION TO CONTINUE  
SENTENCING HEARING  
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by and through RENE L. VALLADARES, Federal Public Defender and LAUREN D. GORMAN, Assistant Federal Public Defender, counsel for JOSUE BERNAL RODRIGUEZ and CHRISTOPHER CHIOU, Acting United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for the UNITED STATES OF AMERICA, that the Sentencing hearing set for March 15, 2022, at 1:30 PM, be vacated and continued to March 29, 2022, at 1:30 PM.

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The continuance is necessary for the following reasons:

1. This is a joint request by counsel for the Government and counsel for the Defendant, Mr. Rodriguez.

2. The additional time requested by this Stipulation is reasonable pursuant to Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed in this rule.”

3. Both counsel request this additional time in order to allow adequate time to research sentencing issues and to prepare for the sentencing hearing.

4. Mr. Rodriguez is on bond and agrees to the continuance. Specifically, Mr. Rodriguez was informed that the continuance will allow defense counsel to continue to gather documents in support of the hearing and provide continuity of counsel.

5. This is the first request for continuance of the sentencing hearing.

DATED this 7<sup>th</sup> day of February, 2022.

RENE L. VALLADARES  
Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

By /s/ Lauren D. Gorman  
LAUREN D. GORMAN  
Assistant Federal Public Defender  
Counsel for JOSUE RODRIGUEZ

By /s Megan Rachow  
MEGAN RACHOW  
Assistant United States Attorney  
Counsel for the Government

**ORDER**

Based on the Stipulation of counsel, and good cause appearing,

**IT IS THEREFORE ORDERED** that the Sentencing Hearing currently set for March 15, 2022, at 1:30 PM, be vacated and continued to **March 29, 2022, at 1:30 PM.**

DATED this 10th day of February, 2022.



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LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE